

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

EDMAR FINANCIAL COMPANY, LLC;  
IRISH BLUE & GOLD, INC.; and XTX  
MARKETS LIMITED,

Plaintiffs,

vs.

CURRENEX, INC.; GOLDMAN SACHS &  
CO. LLC; HC TECHNOLOGIES, LLC;  
STATE STREET BANK AND TRUST  
COMPANY; STATE STREET GLOBAL  
MARKETS INTERNATIONAL LIMITED;  
and JOHN DOE DEFENDANTS 1-5,

Defendants.

Case No. 21-cv-06598

**DECLARATION OF DANIEL L.  
BROCKETT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR LEAVE TO  
FILE THIRD CONSOLIDATED  
AMENDED CLASS ACTION  
COMPLAINT**

I, DANIEL L. BROCKETT, submit this declaration pursuant to 28 U.S.C. § 1746, and declare under penalty of perjury as follows:

1. I am one of the Counsel for Plaintiffs in the above-captioned action. I make this declaration in support of Plaintiffs' motion for leave to file the proposed Third Consolidated Amended Class Action Complaint ("TAC").
2. Attached hereto as Exhibit 1 is a true and correct copy of the proposed TAC.
3. Attached hereto as Exhibit 2 is a true and correct "redline" document, which identifies all changes in the proposed TAC as compared to the Second Amended Class Action Complaint (Dkt. No. 96).

I certify under the penalty of perjury the forgoing statements are true and correct.

Executed in New York, New York on this 16th day of May 2025.

*/s/ Daniel L. Brockett*  
Daniel L. Brockett